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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

DERMOT DESMOND,

Plaintiff,

v.

PAUL SIEGEL, GLOBECON GROUP
HOLDINGS, L.L.C., and
GODADDY.COM, INC.,

Defendants.

Civil Action No. _____

Hon. _____

VERIFIED COMPLAINT

Plaintiff Dermot Desmond (“plaintiff” or “Desmond”), whose residence is 57 Line Wall Road, Gibraltar, Great Britain, by his undersigned counsel, for his complaint against defendants Paul Siegel, who resides at 171 South St., Demarest, NJ 07627 (“Siegel”), Globecon Group Holdings, L.L.C., which has an address of 285 Westside Avenue, Jersey City, NJ 07627 (“Globecon”) and GoDaddy.com, Inc., which has an address of 1445 N. Hayden Road, #219, Scottsdale, Arizona 85260 (“GoDaddy”) (collectively, “defendants”), alleges as follows:

Nature Of The Action

1. This is an action for injunctive relief and damages arising out of the recent publication by Siegel and Globecon of abusive, untruthful and defamatory statements about plaintiff on an Internet website — meetdermotdesmond.com — that is registered and hosted by GoDaddy. As detailed below, Siegel and Globecon, who are competitors of plaintiff, falsely and maliciously accuse plaintiff of various criminal acts, including theft, tax evasion and other sordid conduct without the slightest basis in fact.

Parties

2. Plaintiff is a successful businessman and a citizen of the Republic of Ireland. Over the last four decades, Mr. Desmond's business interests and investment holdings have included, among others, the Bank of Ireland, London City Airport, the Celtic FC football (soccer) club, an e-learning company called Intuition Publishing Ltd. ("Intuition Publishing"), the Sandy Lane hotel in Barbados, and International Investment and Underwriting, a private equity firm. Mr. Desmond's success is founded on his well-known reputation for hard work, integrity and trustworthiness.

3. Defendant Siegel is an owner and officer of defendant Globecon. He is also the managing director of an affiliated company, Globecon Group, L.L.C. ("Globecon Group"). Siegel is the creator of the website meetdermotdesmond.com, and the author of the content contained on that website. Siegel resides at 171 South St., Demarest, NJ, 07627 and is a citizen of New Jersey for diversity purposes.

4. Defendant Globecon is a limited liability company that purports to provide professional development services for corporate and investment banking

customers. Globecon is the registrant of the domain name meetdermotdesmond.com. Globecon is a limited liability company incorporated in Delaware with a business address of 285 Westside Avenue, Jersey City, NJ, 07627 and is a citizen of Delaware and New Jersey for the purposes of diversity jurisdiction.

5. Defendant GoDaddy is a company that provides Internet domain name registration and hosting services. GoDaddy provides the registration services for the domain name meetdermotdesmond.com, and provides hosting services for that website. GoDaddy is incorporated in Arizona and has its headquarters at 1445 N. Hayden Road, #219, Scottsdale, Arizona 85260. GoDaddy is a citizen of Arizona for diversity purposes.

Jurisdiction and Venue

6. Jurisdiction is proper in this Court pursuant to 28 U.S.C. § 1332(a)(2). There is complete diversity because this action is between “citizens of a State and citizens or subjects of a foreign state,” in that plaintiff is a citizen of the Republic of Ireland and defendants are citizens of the States of Arizona, Delaware or New Jersey. The matter in controversy, exclusive of interest and costs, exceeds the sum or value of \$75,000.

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(a)(2) and (a)(3) because a substantial portion of the events giving rise to the claim occurred in this District and defendants are subject to personal jurisdiction in this District.

Facts

Siegel and Globecon Publish Defamatory and Abusive Content on the Internet

8. On or about October 16, 2010, Siegel and Globecon – using the registration and hosting services of GoDaddy and the proxy service of GoDaddy’s affiliate, Domains by Proxy, Inc. (“DBP”) – published the website meetdermotdesmond.com to the public on the Internet.

9. Siegel and Globecon sought to hide their identities by using DBP, an Arizona-based proxy service that masks the identity of the registrant of an Internet domain name. This shows that they knew that they were maliciously intending to deceive the public, and wanted to frustrate any efforts by plaintiff or others to root out that deception. On October 25, 2010, DBP canceled their privacy services for the meetdermotdesmond.com Internet domain, which allowed plaintiff to identify Siegel and Globecon as being responsible for the content on that site.¹

10. On October 25 or 26, 2010, after DBP canceled Mr. Siegel’s and Globecon’s privacy services, those defendants attempted to cover up their wrongdoing. At that time, Siegel and Globecon made several of the internal links of the meetdermotdesmond.com website accessible only by use of a password. This temporary change – which Siegel and Globecon can undo at any time, as they wish – does not protect plaintiff’s reputation, for several reasons: (a) the website’s home page remains, which continues to contain defamatory material, including falsely accusing

¹ DBP took that action after receiving a written complaint form and letters from plaintiff’s counsel.

plaintiff of being a thief and a tax evader, (b) plaintiff's reputation is subject to the whim of Siegel and Globecon as to when they want to put their defamatory statements back up for the general public's review, and (c) Siegel and Globecon included new false statements on the home page that remains accessible, such as stating that "public ridicule" is good for plaintiff because his "chromosomes and breeding may drive" him "in the exact opposition direction" of being "legal." Outlined below is the defamatory material that Siegel and Globecon made available to the public as recently as October 25, 2010, and as to which Siegel and Globecon can choose to allow public viewing at any time absent an injunction from the Court.

11. The meetdermotdesmond.com website contains numerous abusive, untruthful and defamatory statements. Most of the material on the website attacks plaintiff's reputation, his honesty and his integrity. Some pages falsely accuse plaintiff of crimes. Others falsely accuse him of association with criminals and child molesters. Still others attack his family and link to sexually explicit content. Continued publication of this material will cause immediate and irreparable harm to plaintiff's reputation in the eyes of the community as well as his business and personal relationships.

12. In many places, the meetdermotdesmond.com website falsely impersonates plaintiff; many of the statements on it falsely purport to be plaintiff's own words. The meetdermotdesmond.com site even contains a fake link to a "blog" that plaintiff supposedly authored (but did not). Their outright deception in attributing untruthful statements on this website to plaintiff shows that the Siegel and Globecon,

the authors of the website — who are obviously fully aware that Mr. Desmond never made the statements or had any involvement in creating or authoring the website — are acting with full knowledge of the falsity of their statements.

13. Siegel and Globecon published the statements on the meetdermotdesmond.com website and made them available to any member of the public with an Internet connection.

14. Some examples of the abusive, untruthful and defamatory statements created by Siegel and Globecon and contained on the meetdermotdesmond.com website are set forth below:

False Accusations of Theft Against Plaintiff And Intuition Publishing

(a) Much of the content of the meetdermotdesmond.com website concerns allegations of criminal acts by plaintiff and Intuition Publishing. These allegations center around the supposed large-scale theft of intellectual property by Intuition Publishing from Siegel's Globecon Group. As an introduction to this spurious allegation, the meetdermotdesmond.com website contains a purported "Overview" of Intuition Publishing. In this regard, Siegel's and Globecon's site fictitiously has plaintiff setting out a supposed plan for Intuition Publishing to "dominate the world of online education" and lists "Steal intellectual property" among the "ingredients" in that plan. The statements made on this page (<http://meetdermotdesmond.com/Intuition.html>) purport to be made by plaintiff, but plaintiff did not make them. Further, the statements themselves are false and have harmed plaintiff's reputation and continue to harm plaintiff.

(b) Next, on a page titled “Our Strategy for Success” (http://meetdermotdesmond.com/Strategy_for_Success.html) – also deceptively written as if plaintiff were the author – Siegel and Globecon further (and falsely) describe Intuition Publishing’s alleged business plan. This page describes how Intuition Publishing supposedly planned to “steal” a “vast library of very sophisticated finance content and elearning courses” from the “Globecon Group.” According to this site, “Intuition would steal this content, convert it to multimedia and deliver it as if it were Intuition’s own” and would “generate tens of millions of revenues through the purloined Globecon IP.” It goes on to state that “[a]ny fallout from the theft can be dealt with through the millions of dollars generated in elearning license fees.” All of these statements are false. There was and is no theft – Intuition Publishing has been publishing its products for the banking sector since its foundation in 1985, and was already the market leader when Siegel and his Globecon Group acquired certain assets from the trustee of a bankrupt company in 2002. Intuition Publishing did not steal any intellectual property from Siegel or the Globecon Group (or any other company), nor did plaintiff or any of Intuition Publishing’s employees do so. The plan Siegel and Globecon set forth on this page is a fabrication.

(c) The “Our Strategy for Success” page also contains a link to a page that purports to describe how Intuition Publishing’s supposed theft of Globecon Group’s intellectual property was accomplished.

(http://meetdermotdesmond.com/A_Timeline_to_Crime.html.) Included in this false timeline are statements such as “Globecon gets wind of IP theft that Desmond Dermot

has engineered.” Again there was no theft; these statements by Siegel and Globecon are completely untruthful. Siegel’s timeline also says that plaintiff made threats against Globecon Group, stating that he said “kill Globecon or I will kill you” and that he told Siegel in a 2010 letter that “if you let anyone know about this I will ruin you and your family.” This is false. Plaintiff never made such a threat, which is proven by the correspondence referred to in this timeline itself. Like the rest of the content, Siegel and Globecon — the authors of this website — intentionally made this statement knowing it was false.

And the website attributes another threatening quote to plaintiff at http://meetdermotdesmond.com/Threats_Work_.html: “‘I will crush you if you ever let anyone know how we stole this IP. I have the money to do it.’ DD.” Plaintiff never said that or anything remotely like it. Each and every one of these supposed threatening statements is false and maliciously made to harass plaintiff and injure his reputation. Further, the “Strategy for Success” page has the following quote attributed by Siegel to “DD” (*i.e.*, plaintiff): “I have been running corrupt enterprises for years!” This is completely untrue. In reality, plaintiff has built his reputation for integrity and trustworthiness for decades, all of which is threatened by the ill-will and malice exhibited on every page of the meetdermotdesmond.com website.

False Allegations That Plaintiff is a Thief

(d) The home page of the meetdermotdesmond.com site (<http://meetdermotdesmond.com/Home.html>) contains a picture of plaintiff and a business associate playing golf, bearing the caption “pickpocket.” The site goes on to

make statements such as “if you play golf with Dermot, as our unwitting dupe in the blue at the right did, you better check your pockets closely” and “[a]s a punter in his heart, Wee Dermot grew to a man and learned ‘don’t pay for anything you can get by pinching someone’s pocket.’ So pinch he did.” Another page —

http://meetdermotdesmond.com/Slight_of_Hand.html — repeats this allegation of thievery. These statements are all false and are directly intended to call into question plaintiff’s honesty and integrity. Plaintiff never picked anyone’s pocket or stole money or anything else from anyone.

False Accusations of Tax Evasion

(e) The meetdermotdesmond.com website contains a heading of “Tax Evasion” and implies that plaintiff has illegally evaded taxes.

http://meetdermotdesmond.com/Tax_Avoidance.html. That is completely untrue.

False Accusations That Plaintiff Associates With Criminals and Child Molesters

(f) Aside from the untrue accusations of theft and other criminal activity (including a completely false reference to plaintiff as a rapist), additional portions of the meetdermotdesmond.com site falsely accuse plaintiff of associating with criminals, including rapists, murderers and pedophiles. For example, one page — again purporting to speak as plaintiff — asks the public to “Contact my hardened criminal friends,” who are stated to be “hardened criminals, murderers and pederasts.” (http://meetdermotdesmond.com/My_Barrister_s_Letter.html.) Plaintiff has no such friends. This statement is false and has harmed plaintiff’s reputation.

(g) In the same malevolent spirit, another page authored by Siegel and Globecon purports to be plaintiff listing his “role models,” which include Oliver O’Grady (a former Catholic priest who allegedly “raped molested and abused many children in California”), Colonel Thomas Blood (an alleged thief, would-be kidnapper and murderer) and “Tiger” Roche (an alleged thief and murderer). (http://meetdermotdesmond.com/Role_Models.html.) Again, like the rest of the meetdermotdesmond.com site, these statements are false and are also falsely attributed to plaintiff. They are designed by Siegel and Globecon to impugn plaintiff’s name and damage his reputation and will do so every day until the site is removed from the Internet.

(h) The “My Role Models” page also falsely accuses plaintiff of sodomy, attributing the following quote to his “closest friend”: “Once a bugger, always a bugger-er.”

Other False, Abusive and Harassing Material

(i) On another page, plaintiff is portrayed by Siegel and Globecon as saying, “[m]y grandmother’s teeth were as tight as the cheeks on this fellow’s butt.” (http://meetdermotdesmond.com/Favor_Desmond_Quotes.html.) This page contains a link to an unknown user’s Facebook page, showing a photograph of a man exposing his naked buttocks. Plaintiff did not make the statement attributed to him about his grandmother, nor did he create any link to the explicit content.

(j) The meetdermotdesmond.com website also has a fake link to “Dermot’s Blog.” Before Siegel and Globecon learned that they had been discovered by

plaintiff, when a member of the public clicked on this link they were brought to a fake “blog” supposedly authored by plaintiff. (<http://dermotdesmond.wordpress.com>.)

This “blog” had another copy of the spurious “Timeline of a Crime” found on the meetdermotdesmond.com main site, which was falsely noted as “Posted on October 18, 2010 by dermotdesmond.” Plaintiff never posted anything on this fake “blog,” and certainly did not post the untruthful and defamatory statements contained in the “Timeline of a Crime.”

(k) The last page of the meetdermotdesmond.com website is titled “Contact Dermot.” This page lists plaintiff’s address, phone number and business email and goes on to state that plaintiff will buy members of the public an obscene tee-shirt; it solicits money from them to send to plaintiff for that purpose.

http://meetdermotdesmond.com/Contact_Me.html. Again, the website is falsely impersonating plaintiff. Further, this tee-shirt contained a racist portrayal of an Irish stereotype, a theme that runs throughout the meetdermotdesmond.com website (including its reference to a former Catholic priest child molester with an Irish name as one of plaintiff’s alleged “role models”).

15. The abusive, untruthful and defamatory statements made about plaintiff, his family and companies with which he is associated have seriously harmed plaintiff’s reputation in the community and defamed his character and will continue to do so.

16. All of the false statements made on the meetdermotdesmond.com website were made by Siegel and Globecon in knowing, reckless or negligent disregard of their falsity.

17. There is evidence that Siegel and Globecon will soon make even more false and harassing statements on the meetdermotdesmond.com website about plaintiff, his family or companies with which he is associated. Several sections of that website state, "Facts and figures to be added soon." For example, this statement is made in a section dedicated to London City Airport.

(http://meetdermotdesmond.com/London_City_Airport.html.) This page also describes plaintiff as "London City's Biggest Crook," a grievous accusation in the London financial market where reputation is of paramount importance. More false statements made in the same vein as those already on the meetdermotdesmond.com website will only further damage plaintiff's reputation and standing in the business community.

History of Siegel's False Accusations Against Plaintiff and Intuition Publishing

18. The allegations of theft of intellectual property leveled by Siegel and Globecon against plaintiff and Intuition Publishing are not new. In fact, Siegel and his Globecon Group have been making such false allegations for years.

19. Intuition Publishing provides blended computer-based training to major financial institutions, both in the United States and abroad. A full description of its services can be found at <http://www.intuition.com>. Plaintiff founded Intuition Publishing twenty-five years ago, and remains active in its management.

20. Siegel and Globecon Group have a long history of attempting to discredit Intuition to potential customers. On April 9, 2007, Globecon Group filed suit against Intuition Publishing in the United States District Court for the Southern District of New York.² Among other things, Siegel alleged that Intuition Publishing stole Globecon Group's intellectual property and infringed Globecon Group's copyrights. In response to Siegel's complaint, Intuition Publishing filed a motion to dismiss; in August 2007, the New York court dismissed the complaint based on Globecon Group's inability to confirm its baseless allegations of infringement.

21. Siegel's plan to use litigation to damage Intuition Publishing's business reputation and relationships also included harassing Intuition Publishing's customers. Before even receiving notice of Globecon Group's suit, Intuition Publishing discovered that Siegel had contacted Bank of America, a long-standing customer of Intuition Publishing, and informed it that he was suing Intuition Publishing based on Intuition Publishing's alleged misappropriation of Globecon Group's intellectual property. Without any basis for doing so, Siegel then threatened to sue Bank of America if it continued to do business with Intuition Publishing. Although Intuition Publishing demanded that Siegel retract his patently false statements, he never did so.

22. Even after the New York court dismissed his meritless lawsuit, Siegel continued to harass Intuition Publishing's customers, and continued to falsely

² *Globecon Group, LLC v. Intuition Publishing, Inc. and Patrick Pancoast*, 07-CV-2817 (S.D.N.Y.; complaint filed April 9, 2007).

inform Intuition Publishing's customers that Globecon Group was suing Intuition Publishing for allegedly stealing its intellectual property.

23. Most recently, in June and July 2010, Siegel sent letters to plaintiff once again accusing him and Intuition Publishing of stealing Globecon Group's intellectual property. Soon after sending these letters, Siegel decided to publish his false and abusive accusations to the public at large via the Internet.

COUNT I
(Defamation Against Defendants Siegel and Globecon)

24. Plaintiff re-alleges and incorporates by references the allegations contained in Paragraphs 1 through 23 above with the same force and effect as if set forth in full.

25. Siegel and Globecon published false and defamatory statements to the public about plaintiff, and continue to publish those false statements through the Internet website meetdermotdesmond.com.

26. These statements defamed plaintiff's character and damaged his reputation in the eyes of the community, and continue to do so.

27. Siegel and Globecon knowingly, recklessly or negligently disregarded the falsity of their statements on the meetdermotdesmond.com website.

28. Siegel and Globecon published these false and defamatory statements with actual malice toward plaintiff.

29. Siegel's and Globecon's false and defamatory statements are not covered by any applicable privilege.

30. Plaintiff has suffered damages as a result of Siegel and Globecon's defamatory statements.

COUNT II
(Defamation Per Se Against Defendants Siegel and Globecon)

31. Plaintiff re-alleges and incorporates by references the allegations contained in Paragraphs 1 through 30 above with the same force and effect as if set forth in full.

32. Siegel and Globecon published false and defamatory statements to the public about plaintiff, and continue to publish those false statements through the Internet website meetdermotdesmond.com.

33. The statements made by Siegel and Globecon on the meetdermotdesmond.com website have injured plaintiff in his profession, trade or business. They also accuse plaintiff of committing crimes and other conduct involving moral turpitude or occupational incompetence or misconduct. As such, damages are presumed.

34. Siegel and Globecon knowingly, recklessly or negligently disregarded the falsity of their statements on the meetdermotdesmond.com website.

35. Siegel and Globecon published these false and defamatory statements with actual malice.

36. Siegel's and Globecon's false and defamatory statements are not covered by any applicable privilege.

37. Plaintiff has suffered damages as a result of Siegel and Globecon's defamatory statements.

COUNT III
(False Light Against Defendants Siegel and Globecon)

38. Plaintiff re-alleges and incorporates by references the allegations contained in Paragraphs 1 through 37 above with the same force and effect as if set forth in full.

39. Siegel and Globecon's false and abusive statements have placed plaintiff in a false light that would be highly offensive to a reasonable person.

40. Siegel and Globecon had knowledge of, or acted in reckless disregard as to, the falsity of their published statements on the meetdermotdesmond.com website and the false light in which plaintiff would be placed.

41. Plaintiff has suffered damages as a result of Siegel and Globecon's conduct.

COUNT IV
(Intentional Infliction of Emotional Distress
Against Defendants Siegel and Globecon)

42. Plaintiff re-alleges and incorporates by references the allegations contained in Paragraphs 1 through 41 above with the same force and effect as if set forth in full.

43. Siegel and Globecon's malicious and false statements on the meetdermotdesmond.com website have caused plaintiff distress of a severity which no reasonable person should be expected to endure.

44. Siegel's and Globecon's conduct is so extreme and outrageous as to go beyond all possible bounds of decency, and to be regarded as atrocious and utterly intolerable in a civilized community.

45. The false statements made by Siegel and Globecon on the meetdermotdesmond.com website proximately caused plaintiff to suffer emotional distress.

46. Siegel and Globecon acted intentionally or recklessly in making the complained-of false statements and intended to, or acted in reckless disregard of, the emotional distress that these statements caused plaintiff.

47. Plaintiff has suffered damages as a result of Siegel and Globecon's intentional infliction of emotional distress.

COUNT V
(Injunctive Relief Against Defendants)

48. Plaintiff re-alleges and incorporates by references the allegations contained in Paragraphs 1 through 47 above with the same force and effect as if set forth in full.

49. Plaintiff has a reasonable probability of eventual success in this litigation on the merits on his claims of defamation, defamation *per se*, false light and

intentional infliction of emotional distress as the defamatory statements are patently false and defamatory *per se*.

50. Plaintiff has and will continue to suffer immediate and irreparable injury if injunctive relief is not granted. Specifically, plaintiff will suffer irreparable harm if this Court does not (a) order defendants to remove all defamatory content from the meetdermotdesmond.com website, and (b) enjoin defendants from publishing any further false and defamatory statements about plaintiff. Without injunctive relief, defendants will be allowed to continue maliciously publishing defamatory statements intended to damage the reputation of plaintiff.

51. The balance of hardships and equities favors plaintiff. On the one hand, Siegel and Globecon will be denied only the continued right to publish injurious lies about plaintiff – there is no hardship in such a denial. On the other hand, if this Court does not grant an injunction, plaintiff's reputation will continue to be irreparably damaged by Siegel's and Globecon's malicious falsehoods. Therefore, granting preliminary relief to plaintiff will not result in even greater harm to Siegel and Globecon.

52. A preliminary and permanent injunction is in the public interest. The public has no interest in the dissemination of abusive, false and defamatory speech.

WHEREFORE, plaintiff prays for the following relief:

(A) A temporary restraining order, preliminary injunction and permanent injunction:

1. Directing that Defendant GoDaddy terminate registration and hosting of the meetdermotdesmond.com website and immediately remove that website from the Internet;

2. Enjoining Defendant GoDaddy from registering, hosting or otherwise facilitating any internet website that includes the types of statements referred to in paragraph 3 (including subparagraphs 3(a) through (g)) below or any statements that otherwise defame Plaintiff or place Plaintiff in a false light;

3. Directing Defendants Siegel and Globecon to remove all statements or images from the meetdermotdesmond.com website or any other internet website that defame Plaintiff or place Plaintiff in a false light, including, **but not limited to**, the following specific statements or images:

(a) Any statements regarding a supposed theft of or plan to steal intellectual property by Plaintiff and Intuition Publishing from Siegel, Globecon, or any related company, including statements such as “Intuition would steal this content, convert it to multimedia and deliver it as if it were Intuition’s own” and would “generate tens of millions of revenues through the purloined Globecon IP” and that “[a]ny fallout from the theft can be dealt with through the millions of dollars generated in elearning license fees” and the statement that “I have been running corrupt enterprises for years!” or “Globecon gets wind of IP theft that Desmond Dermot has engineered” or any other statements suggesting theft or plans to steal intellectual property.

(b) Any statements that Plaintiff threatened to kill, ruin or otherwise harm Globecon, any related company, Siegel or Siegel's family.

(c) Any images or associated statements to the effect that Plaintiff is a thief or swindler such as the picture of Plaintiff and a business associate playing golf, bearing the caption "pickpocket," and including the statements "if you play golf with Dermot, as our unwitting dupe in the blue at the right did, you better check your pockets closely" and "[a]s a punter in his heart, Wee Dermot grew to a man and learned 'don't pay for anything you can get by pinching someone's pocket.' So pinch he did."

(d) Any statements implying that Plaintiff has illegally evaded taxes or engaged in any criminal activity.

(e) Any statements that Plaintiff associates with criminals, including rapists, murderers and pedophiles, such as the statement attributed to Plaintiff that asks the public to "Contact my hardened criminal friends," who are stated to be "hardened criminals, murderers and pederasts" at http://meetdermotdesmond.com/My_Barrister_s_Letter.html, or the statement that Plaintiff's purported role models are Oliver O'Grady (a former Catholic priest who allegedly "raped molested and abused many children in California"), Colonel Thomas Blood (an alleged thief, would-be kidnapper and murderer) and "Tiger" Roche (an alleged thief and murderer);

(f) Any statements that Plaintiff engages in lewd or indecent sexual acts such as statements accusing Plaintiff of sodomy -- "Once a bugger, always a bugger-er" at http://meetdermotdesmond.com/Role_Models.html.

(g) Any statement attributed to Plaintiff that he did not make such as "My grandmother's teeth were as tight as the cheeks on this fellow's butt" at http://meetdermotdesmond.com/Favor_Desmond_Quotes.html or the statements purportedly authored by Plaintiff in a fake "blog" site at <http://dermotdesmond.wordpress.com> or statements attributed to Plaintiff contained at http://meetdermotdesmond.com/Contact_Me.html referring to an alleged offer that Plaintiff would buy members of the public an obscene tee-shirt, which contained a racist portrayal of an Irish stereotype.

4. Enjoining Defendants Siegel, Globecon or any related company from otherwise publishing the above referenced types of statements or any other statements that defame Plaintiff or place Plaintiff in a false light;

(B) An award of compensatory damages in an amount in excess of \$75,000, the exact amount to be proved at trial;

(C) An award of punitive damages to be determined at trial; and

(D) Such other and further relief as the Court deems just and proper.

Dated: Jersey City, New Jersey
October 27, 2010

Respectfully submitted,

HUGHES HUBBARD & REED LLP
A NEW YORK LIMITED LIABILITY PARTNERSHIP

By: /s/ Wilfred P. Coronato
Wilfred P. Coronato

CERTIFICATION

I hereby certify that the matter in controversy is not the subject of any other court, arbitration or administrative proceeding, except for a claim pending before the High Court of Justice, Queen's Bench Division, in London, England. Parties thereto are Dermot Desmond (claimant), Paul Siegel, Globecon Group LLC, and Go Daddy Europe Limited (defendants). The claim number is HQ10X04089, issued on October 26, 2010.

/s/ Wilfred P. Coronato

Of Counsel:

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VERIFICATION OF PLEADING BY CERTIFICATION

I, Dermot Desmond, have read the foregoing Verified Complaint. Based upon my personal knowledge, I hereby declare under penalty of perjury under the laws of the United States of America that the facts set forth therein are true and correct. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me is willfully false, I am subject to punishment.


Dermot Desmond

Executed on: October 27, 2010